

JAP:DMB

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

06- 206M-111

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C.
§§ 922(a)(1)(A), 2)

STANLEY PARKS,
also known as "Seven," and
DAWN MARIE JENKINS,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

ANTHONY MELCHIORRI, being duly sworn, deposes and says that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between August 2005 and February 21, 2006, within the Eastern District of New York and elsewhere, the defendants STANLEY PARKS, also known as "Seven," and DAWN MARIE JENKINS, not being licensed importers, manufacturers, or dealers in firearms, did knowingly and willfully engage in the business of dealing in firearms.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

The source of your deponent's information and the grounds for his belief are as follows:

1. I have been a Special Agent with the ATF for approximately two and one-half years, during which time I have investigated state and federal firearms offenses, including

firearms trafficking into the New York City area. The information set forth in this complaint is based on my own observations, interviews with other law enforcement officers and witnesses, and review of reports and recorded conversations. Conversations set forth in this complaint are set forth in sum and substance and in part.

2. Because the purpose of this complaint is only to establish probable cause to arrest, I have not set forth all the facts and circumstances of which I am aware.

3. On or about January 6, 2006, an undercover detective with the New York City Police Department (the "UC") received a telephone call from the defendant STANLEY PARKS regarding a proposed transaction in which PARKS would sell the UC firearms. PARKS and the UC arranged to meet later that day.

4. On or about January 6, 2006, the defendant STANLEY PARKS met with the UC in the parking lot of an Eckerd Drug Store in Ozone Park, New York (the "Eckerd Parking Lot"). During this meeting, the UC purchased two Hi-Point semi-automatic pistols from PARKS for approximately \$1050.

5. On or about January 11, 2006, the defendant STANLEY PARKS had a telephone conversation with the UC to arrange another firearms purchase. Later that same day, PARKS and the UC met in the Eckerd Parking Lot, and the UC purchased three Hi-Point semi-automatic pistols from PARKS for approximately \$1800.

6. On or about January 18, 2006, the defendant STANLEY PARKS had a telephone conversation with the UC to arrange

another firearms purchase. Later that same day. PARKS and the UC met in the Eckerd Parking Lot, and the UC purchased one Hi-Point semi-automatic pistol, one Leinad .45 caliber pistol, and one Mossberg 12 gauge shotgun from PARKS for approximately \$1900.

7. On or about January 23, 2006, the defendant STANLEY PARKS had a telephone conversation with the UC in which PARKS told the UC that PARKS was in South Carolina obtaining firearms to sell to the UC. PARKS asked the UC to wire him \$150 to defray his transportation costs. The UC asked PARKS to whom he should wire the money, and PARKS replied with his true name and address in South Carolina.

8. Over the following weeks, the defendant STANLEY PARKS sold firearms to the UC at the Eckerd Parking Lot on or about the dates listed below for approximately the amounts listed below:

Date	Firearms Purchased	Amount
January 25, 2006	Armitage International 9mm semiautomatic pistol; Intratec .22 caliber pistol; Lorcin 9mm pistol	\$2700
February 3, 2006	Smith & Wesson .22 caliber pistol; 2 Hi-Point 9mm pistols; Intratec .22 caliber pistol;	\$2900
February 11, 2006	2 Hi-Point .45 caliber pistols; Hi-Point 9mm pistol; Armscor .38 caliber revolver	\$2300

9. On or about February 21, 2006, the defendant STANLEY PARKS had a telephone conversation with the UC in which PARKS stated that he was coming to New York City from South Carolina to sell the UC more firearms. PARKS stated that he

would arrive at Pennsylvania Station in New York City sometime in the afternoon.

10. At approximately 3:45 p.m., I and other law enforcement agents were present at Track 9 at Pennsylvania Station in New York City, observing passengers debarking from an Amtrak train that had arrived from South Carolina. I and other agents observed the defendants STANLEY PARKS and DAWN MARIE JENKINS walking together on the platform, and arrested PARKS and JENKINS. Upon his arrest, PARKS was carrying a roller suitcase containing four firearms: a Llama .45 caliber semi-automatic pistol, a Hi-Point .380 caliber semi-automatic pistol, and two Intratec 9mm semi-automatic pistols.

11. Upon her arrest the defendant DAWN MARIE JENKINS admitted that on two separate occasions, in or about August 2005 and November 2005, she had purchased firearms for the defendant STANLEY PARKS because PARKS, who had previously been convicted of a felony, could not purchase them. The defendant JENKINS stated further that she knew PARKS was reselling the firearms to others.


12. Upon his arrest the defendant STANLEY PARKS stated that the defendant DAWN MARIE JENKINS had accompanied him not only on the February 21, 2006 trip from South Carolina, but also on the January 25, 2006 trip.

13. Federal firearms records indicated that the defendant DAWN MARIE JENKINS purchased two Hi-Point 9mm semi-automatic pistols in South Carolina on or about November 4, 2005.

14. A criminal records check revealed that the defendant STANLEY PARKS was convicted of, among other crimes, distribution of a controlled substance and possession of a handgun, both felonies, in Salem County Superior Court in New Jersey on or about December 5, 1994.

15. According to federal firearms records, neither the defendant STANLEY PARKS nor the defendant DAWN MARIE JENKINS is licensed to import, manufacture, or deal in firearms.

WHEREFORE, your deponent respectfully requests that the defendants STANLEY PARKS, also known as "Seven," and DAWN MARIE JENKINS be dealt with according to law.



ANTHONY MELCHIORRI
Special Agent
Bureau of Alcohol, Tobacco,
Firearms, and Explosives

Sworn to before me this
22nd day of February, 2006



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